

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JUAN ANGEL NIEVES QUIÑONES  
YAMIR GARCIA SEGARRA

Debtors

JUAN ANGEL NIEVES QUIÑONES  
YAMIR GARCIA SEGARRA

Plaintiffs

BANCO POPULAR PUERTO RICO  
WIGBERTO LUGO MENDER, TRUSTEE

Defendants

CASE NO. 18-05445 (BKT)

CHAPTER 7

Adversary No. 18-00138

**MOTION FOR LEAVE TO FILE EXHIBIT  
IN THE SPANISH LANGUAGE**

TO THE HONORABLE COURT:

COMES NOW Defendant Banco Popular de Puerto Rico (also referred to as “BPPR” or the “Bank”) represented by the undersigned attorney and respectfully sets forth and prays:

1. That on even date the appearing party filed a motion for Summary Judgment and a Statement of Uncontested Facts and Memorandum of Law.
2. That in the Statement of Uncontested Facts and Memorandum of Law, the appearing party attached as Exhibit 3 a Title Search and Exhibit 4 a computer print-out from Karibe’s website both of which are written in the Spanish Language.

3. That pursuant to Local Bankruptcy Rule 9070-1(c) BPPR requests leave to file the aforementioned documents in the Spanish language and to submit a certified translated copy to the English language in case of an appeal.

### **NOTICE OF RESPONSE TIME**

Pursuant to the provisions of Local Bankruptcy Rule 9013-1(c)(1) within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE Defendant prays from this Honorable Court to grant leave to file Exhibits 3 and 4 of the Statement of Uncontested Facts and Memorandum in the Spanish language and to submit a certified translated copy to the English language, only in the event of an appeal.

In San Juan, Puerto Rico this 12<sup>th</sup> day of July, 2019.

### **CERTIFICATE OF ELECTRONIC FILING AND SERVICE**

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Roberto Figueroa Carrasquillo, Esq., and Wigberto Lugo Mender, Esq., Trustee, Esq.** Chapter 13 Trustee. I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: None.

*/s/ José F. Cardona Jiménez*  
USDC PR 124504  
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